Surrey Dormouse Group Comments on Appeal Ref: APP/Y3615/W/22/3300200 Urn Field, Downside Road, Guildford GU4 8PH regarding Planning Application 20/P/00825

To whom it may concern:

1. Hazel dormice *Muscardinus avellanarius* are undoubtedly present in the woodland adjacent to site. They are present in connected woodland, as a data search from Surrey Biodiversity Information Centre will confirm. A recent record also exists from a residential garden immediately adjacent to site.

2. In the UK, dormice are legally protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and have significant further protection as a European Protected Species under the Conservation of Habitats and Species Regulations 2010 (as amended). Dormice are also a 'Species of Principal Importance for the conservation of biodiversity' listed under section 41 of the Natural Environment and Rural Communities Act 2006 (NERC), which places a 'Biodiversity Duty' on all public bodies to have regard to the conservation of biodiversity, which includes giving consideration to the restoration and enhancement of species and habitats.

3. Nationally, the dormouse population has declined by 50% since 2000, due in part to loss and fragmentation of habitat. Many of the sites monitored by Surrey Dormouse Group reflect this national decline in terms of numbers of animals being found year on year. It is therefore imperative to ensure that any development, however small, takes place with due regard to dormice and to other protected species.

4. The Dormouse Conservation Handbook (English Nature, 2006) provides the following information regarding disturbance to dormice:

   "Direct modifications to sites, including the felling of trees or scrub clearance, can have a significant impact on dormice. Even where trees and shrubs remain largely unaffected, or where work is done in winter, there may still be significant implications for hibernating dormice and the places where they overwinter.

   Activities associated with development works are likely to lead to an increase in human presence at the site, extra noise and changes in the site layout and local environment. All these may have a detrimental effect on dormice, their needs for particular environmental conditions (such as specific temperature and humidity regimes), and a stable landscape that allows them to follow established routes to feed (see below)."

5. It is noted that specifications for the use of floodlighting are conditioned as part of the Appeal Decision and this will reduce nocturnal disturbance to dormice in the adjacent woodland. The planned vegetation clearance, however, has the potential to cause disturbance or harm to dormice and their habitat.

6. The Appeal Decision document, Schedule of Conditions requires that:

   "4) Prior to the commencement of development a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority.

   The LEMP shall include […]

   ix) a method of works strategy for the loss of woodland with regard to the effect on dormice, including a watching brief by a suitably qualified ecologist"

7. The conditioning of an LEMP is welcomed and we would like to provide the following information regarding timing of works and ecological supervision required.

   - As a minimum, vegetation clearance must take place under the supervision of a suitably qualified and experienced ecologist, who will search vegetation for nests and animals before it is removed using hand tools.
   - Vegetation clearance should be a two-stage process. Above ground clearance should take place during dormouse hibernation season, with a fingertip search at ground level for hibernation nests before work takes place to avoid trampling.
   - Clearance at ground level, including root removal and stump grinding, should take place during active season so as not to harm any dormice hibernating on the ground below tree roots, under leaf litter or in tussocky grass at the edge of the woodland.

8. In addition, as dormice are known to build hibernation nests a few metres out from the woodland edge, storage of materials within this area could inadvertently provide nesting and hibernation opportunities for dormice and must be avoided, with a fenced buffer set up around the woodland.

9. In the event that a dormouse is found during works, all work must cease immediately and the advice of a suitably qualified and experienced person must be sought in the first instance. Should a dormouse be found on site at any time, there may be a requirement for a Natural England Protected Species Licence to allow work to continue.

Kathryn Killner/SDG Committee 18.01.23